

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
E. JEAN CARROLL,

Plaintiff,

New York, N.Y.

v.

22 Civ.10016 (LAK)

DONALD J. TRUMP,

Defendant.

-----x

Jury Trial

April 26, 2023
10:10 a.m.

Before:

HON. LEWIS A. KAPLAN,

District Judge
and a Jury

APPEARANCES

KAPLAN HECKER & FINK LLP
Attorneys for Plaintiff
BY: ROBERTA A. KAPLAN
MICHAEL J. FERRARA
SHAWN G. CROWLEY
MATTHEW J. CRAIG

TACOPINA SEIGEL & DeOREO
Attorneys for Defendant
BY: JOSEPH TACOPINA
CHAD D. SEIGEL
MATTHEW G. DeOREO

HABBA MADAIIO & ASSOCIATES, LLP
Attorneys for Defendant
BY: MICHAEL T. MADAIIO

W. PERRY BRANDT
Attorney for Defendant

1 Q. How large a family?

2 A. Mother, father, four children, and a dog and a cat.

3 Q. Where do you fall in the children?

4 A. I am the firstborn.

5 Q. Are you currently married?

6 A. No.

7 Q. Why are you here today?

8 A. I am here because Donald Trump raped me, and when I wrote
9 about it, he said it didn't happen. He lied and shattered my
10 reputation, and I am here to try to get my life back.

11 Q. We are going to talk at length about that in a few minutes,
12 but let's first cover a little bit more of your background.

13 Okay?

14 A. Um-hmm.

15 Q. Where did you go to college?

16 A. Indiana University.

17 Q. Can you give us a sense of what sorts of activities you
18 were involved in?

19 A. I was in a sorority and I was a cheerleader.

20 Q. How about beauty pageants?

21 A. My sorority would nominate me to be in beauty pageants.

22 Q. I want to show you what's been marked for identification as
23 Plaintiff Exhibit 13.

24 Do you recognize this?

25 A. Yes. That's Ms. America on the right and that's my

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6 DONALD J. TRUMP,

7 Defendant.
-----x

Jury Trial

8 April 27, 2023
9 10:50 a.m.

10 Before:

11 HON. LEWIS A. KAPLAN,

12 District Judge
and a Jury

13 APPEARANCES

14 KAPLAN HECKER & FINK LLP
15 Attorneys for Plaintiff
16 BY: ROBERTA A. KAPLAN
MICHAEL J. FERRARA
17 SHAWN G. CROWLEY
MATTHEW J. CRAIG

18 TACOPINA SEIGEL & DeOREO
19 Attorneys for Defendant
20 BY: JOSEPH TACOPINA
CHAD D. SEIGEL
21 MATTHEW G. DeOREO

22 HABBA MADAIO & ASSOCIATES, LLP
Attorneys for Defendant
23 BY: MICHAEL T. MADAIO

24 W. PERRY BRANDT
25 Attorney for Defendant

N4RMCAR4

Carroll - Cross

1 you were still trying to come up with an explanation for your
2 story as why you did not scream.

3 A. I wasn't coming up with a story. It's usually -- I would
4 say more than usually under discussion when a woman is raped
5 and she doesn't scream. It's usually discussed, why didn't she
6 scream. Why didn't you scream, E. Jean? Why didn't you
7 scream? It's what a woman -- you better have a good excuse why
8 you didn't scream. Because if you didn't scream, you weren't
9 raped. I'm telling you, he raped me, whether I screamed or
10 not.

11 Q. You need a minute, Ms. Carroll?

12 A. No. You go right on.

13 Q. Aside from you not being a screamer, another reason you
14 gave for possibly not screaming was because you were wondering
15 if the pressure Donald Trump's shoulder placed against your
16 chest interfered with your ability to scream, correct?

17 A. It could be. I don't need an excuse for not screaming.

18 Q. OK.

19 Despite that, you certainly wish your story included
20 you having screamed?

21 A. Of course I do. More people would have believed me if I
22 had screamed.

23 Q. Aside from not being a screamer, and perhaps his chest was
24 interfering with your ability to scream, along the same lines
25 at some point you prepared a list of questions -- list of